

## **EXHIBIT P**

## Holder, Casey

---

**From:** Hochmuth, Farrell  
**Sent:** Monday, December 07, 2015 10:23 PM  
**To:** Timothy Wedeen  
**Cc:** Hunt, Dean D.; Smith, Rachel M.; Holder, Casey  
**Subject:** RE: Adv. Pro. Nos. 10-04918, 10-05143, and 10-04841 - Discovery Responses

Mr. Wedeen, the Court ordered your clients to answer the Trustee's interrogatories and requests for admission by December 1, nearly a week ago. The close of fact discovery is rapidly approaching on December 18. When are your clients going to respond?

Farrell

---

**From:** Holder, Casey  
**Sent:** Wednesday, December 2, 2015 5:18 PM  
**To:** Timothy Wedeen  
**Cc:** Hunt, Dean D.; Hochmuth, Farrell; Smith, Rachel M.  
**Subject:** RE: Adv. Pro. Nos. 10-04918, 10-05143, and 10-04841 - Discovery Responses

Mr. Wedeen,

Please see copies of the attached orders, stating that Defendants must respond to the Trustee's First Set of Interrogatories and First Set of Requests for the Production of Documents by December 1, 2015.

Best regards,  
Casey

**Casey Holder | BakerHostetler**  
811 Main Street | Suite 1100 | Houston, TX 77002-6111  
T 713.276.1614 | F 713.751.1717  
cholder@bakerlaw.com

**From:** Timothy Wedeen [<mailto:timothy.wedeen@gmail.com>]  
**Sent:** Wednesday, December 02, 2015 5:14 PM  
**To:** Holder, Casey  
**Subject:** Re: Adv. Pro. Nos. 10-04918, 10-05143, and 10-04841 - Discovery Responses

I had it for 12/31! Are you sure about the date?

On Dec 2, 2015 6:02 PM, "Holder, Casey" <[cholder@bakerlaw.com](mailto:cholder@bakerlaw.com)> wrote:

Mr. Wedeen,

As you are aware, Judge Bernstein's orders in the above-referenced adversary proceedings required responses to the Trustee's First Set of Interrogatories and First Set of Requests for the Production of Documents due yesterday, December 1, 2015. We have not yet received discovery responses from your clients. If you sent

them, and we somehow missed them, please let me know when and to whom they were sent so I can locate them. If not, we request that you provide your clients responses immediately.

Additionally, we are prepared to produce documents pertaining to the above referenced matters upon receipt of executed copies of the Non-Disclosure Agreements and Undertaking and Consent to Be Bound to Litigation Protective Order previously provided. Upon receipt of these signed documents, we will forward to you the Trustee's initial document production.

Please let me know if you have any questions.

Best regards,

Casey

**Casey Holder | BakerHostetler**

811 Main Street | Suite 1100 | Houston, TX 77002-6111

T [713.276.1614](tel:713.276.1614) | F [713.751.1717](tel:713.751.1717)

[cholder@bakerlaw.com](mailto:cholder@bakerlaw.com)

---

This email is intended only for the use of the party to which it is addressed and may contain information that is privileged, confidential, or protected by law. If you are not the intended recipient you are hereby notified that any dissemination, copying or distribution of this email or its contents is strictly prohibited. If you have received this message in error, please notify us immediately by replying to the message and deleting it from your computer.

Any tax advice in this email is for information purposes only. The content of this email is limited to the matters specifically addressed herein and may not contain a full description of all relevant facts or a complete analysis of all relevant issues or authorities.

Internet communications are not assured to be secure or clear of inaccuracies as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. Therefore, we do not accept responsibility for any errors or omissions that are present in this email, or any attachment, that have arisen as a result of e-mail transmission.